

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In Re:

Case No: 09-43537-DDO

Genmar Holdings, Inc.,

Chapter 7

Debtor(s).

**TRUSTEE RIES' RESPONSE TO REQUEST OF JACOB
MANAGEMENT CORPORATION FOR PAYMENT OF
PRE-CONVERSION ADMINISTRATIVE EXPENSE**

TO: THE DEBTOR(S) AND OTHER ENTITIES SPECIFIED IN LOCAL RULE 9013-3(a):
Charles W. Ries, as Chapter 7 Trustee, for the Bankruptcy Estates of Genmar Holdings, Inc. ("Trustee") responds to Jacob Management Corporation's Request of Pre-Conversion Administrative Expense claim as follows:

1. Debtor, along with twenty-one related entities, petitioned for bankruptcy protection under Chapter 11 of Title 11 of the United States Code on June 1, 2009.
2. The twenty-two bankruptcy cases ("Consolidated Cases") were administratively consolidated on June 4, 2009.
3. On January 14, 2010, the bankruptcy court approved the sale of substantially all of the assets of the Consolidated Cases.
4. The Consolidated Cases were converted to cases under Chapter 7 on November 22, 2010.
5. Charles W. Ries was appointed as the Chapter 7 bankruptcy trustee on November 23, 2010 for the Consolidated Cases.
6. The bankruptcy court issued an order sua sponte terminating the joint administration on November 24, 2010.
7. Jacob Management Corporation filed a request for payment of pre-conversion administrative expense in the amount of \$808,430.55 in the above-captioned bankruptcy case on February 9, 2011. (Docket No. 1197.)

8. At this point in time the estate has little to no funds available to investigate any particular claims.

9. Trustee Ries does not take a position on whether Jacob Management Corporation should be allowed a pre-conversion administrative expense claim and requests the Court to reserve a final determination on the request.

10. Trustee Ries reserves his right to object to any administrative expense claim allowed to Jacob Management Corporation.

Dated: March 10, 2011.

/e/ Jennifer G. Lurken
Charles W. Ries (#12767X)
Jennifer G. Lurken (#347516)
MASCHKA RIEDY & RIES
Attorneys for Trustee
200 Union Square Business Center
201 North Broad Street
P. O. Box 7
Mankato, MN 56002-0007
Telephone (507) 625-6600

VERIFICATION

STATE OF MINNESOTA

ss.

COUNTY OF BLUE EARTH

Charles W. Ries, declares under the penalty of perjury that he is the Trustee in the above entitled action; that he has read Trustee Ries' Response to Request of Jacob Management Corporation for Payment of Pre-Conversion Administrative Expense and knows the contents thereof; that the same is true to his own knowledge, except as to those matters therein stated on information and belief, and as to those matters he believes them to be true.

/e/ Charles W. Ries
Charles W. Ries

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UNSWORN CERTIFICATE OF SERVICE

The undersigned, being an employee of Maschka, Riedy & Ries, 200 Union Square Business Center, 201 North Broad Street, Mankato, Minnesota, declares under penalty of perjury that on March 10, 2011, she served the following document(s):

Trustee Ries' Response to Request of Jacob Management Corporation for Payment of Pre-Conversion Administrative Expense

Via ECF Electronic Service Upon:

Amy Swedberg
US Trustee

/e/ Wendy A. Hill

Wendy A. Hill